

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

Judge Beckwith  
Magistrate Judge Hogan

vs.

Case No. C-1-01-486

CINCINNATI REDS, a limited partnership,

Defendant.

---

**JOINT STATUS REPORT**

---

Plaintiff United States of America and defendant Cincinnati Reds, by their undersigned attorneys, make this joint status report pursuant to this Court's Order dated November 26, 2001. The parties described the status of settlement negotiations in their Joint Motion to Stay Proceedings Pending Settlement, filed November 20, 2001, and in their monthly Joint Status Reports thereafter.

As noted in the last status report, on February 15, 2005, the Government accepted and signed the formal settlement offer submitted on behalf of the Cincinnati Reds and the other Major League Baseball Clubs on October 21, 2004. The settlement agreement calls for the Government to move for dismissal of this action following receipt of repayment of an agreed portion of the alleged erroneous refund. Delivery of the repayment check on behalf of the Cincinnati Reds is expected early this month (April 2005). The Government's motion for dismissal is therefore expected shortly. Until the repayment can be made and the motion for dismissal can be filed, the parties jointly ask the Court to make no change in the November 26, 2001 Order staying proceedings.

Dated: April 1, 2005

**TAFT, STETTINIUS & HOLLISTER LLP**

---

R. Joseph Parker  
425 Walnut Street  
Suite 1800  
Cincinnati, Ohio 45202-3957  
Telephone: (513) 357-9344

Attorneys for Defendant  
Cincinnati Reds

Dated: April 1, 2005

**UNITED STATES OF AMERICA**

GREGORY G. LOCKHART  
United States Attorney

JAN HOLTZMAN  
Assistant United States Attorney

---

Alejandro L. Bertoldo  
Trial Attorney, Tax Division  
U.S. Department of Justice  
P.O. Box 55  
Ben Franklin Station  
Washington, D.C. 20044  
Telephone: (202) 307-6019

Attorneys for Plaintiff  
United States of America

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1<sup>st</sup> day of April, 2005, I caused a copy of the foregoing document to be sent to Alejandro L. Bertoldo, Trial Attorney, Tax Division, U.S. Department of Justice, P.O. Box 55, Ben Franklin Station, Washington, D.C. 20044 by electronic mail.

/s/ R. Joseph Parker